



Planning & Community Development

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September 19, 2012

The Honorable Dave Sommers, Chair
Snohomish County Council
3000 Rockefeller, M/S 609
Everett WA 98201

RE: Proposed Ordinance Nos. 12-068 and 12-069

Dear Chair Sommers:

While the City supports proposed Ordinance Nos. 12-068 and 12-069, there are several detailed issues that remain unresolved and I urge you to consider them prior to adopting these ordinances.

1. Subarea Height - The Point Wells optional performance standards for properties designated Urban Village 30.31A.115 allows an additional 35 feet of height over the base height of 75 feet with an Environmental Impact Statement (EIS). This total height potential of 110 feet is inconsistent with Shoreline's Point Wells Subarea Plan. In this subarea plan Policy PW-6 states, "New structures in the SE Subarea should rise no more than six stories." Six stories translates to between 60 and approximately 70 feet in height. We recommend that the amendments to county code 30.31A.115 not allow additional building height in the subarea plan's designated SE portion (3.4 acres) of the site.
2. Consistency with Capital Facilities Plan – Part of amended Policy 3.C.5 states, "Provision of needed public services provided by entities other than the county shall be incorporated in the Capital Facilities Plans of services providers and may be planned and programmed in phases." This language is vague without requiring that Point Wells meet Shoreline's Capital Facilities Plan prior to any development approval. Shoreline's suggested language of in our August 20, 2012 letter to the Planning Committee would clarify this important issue. Shoreline's recommendation is that the property owner must successfully negotiate binding agreements with other entities to provide such

services, utilities or infrastructure prior to the county approving a development permit that necessitates the provision of services, utilities or infrastructure.

Policy review is not required with the development review of Point Wells. To ensure this policy is implemented the county's development code may need to be amended. The county's current requirement that traffic concurrency requirements be met is unclear if it includes other entities.

3. SEPA Addendum – The addendum has adjusted to the Urban Village designation and its associated PCB zoning density calculation and traffic analysis with the assumption that 1,800 residential units could be built. However, with the Point Wells 60 acre site and the PCB maximum density of 44 units per acre the impact calculation is 2,640 residential units. The Addendum is insufficient environmental review for the proposed action.

General Comments

- The alternative action option underestimates the number of trips that Point Wells would generate. Given the 1,800 dwelling units, 115 ksf of office, 20 ksf of retail, and a 10% internal capture rate, the ITE trip generation formulas estimate daily trips of 9,176.
- The base model used to analyze development impacts is incorrectly configured for some locations, especially SR 99. It needs to be calibrated correctly to better assess and validate the results.
- The additional alternative does not take safety improvements into account.
- The planning level estimates for some mitigation projects are considerably understated or infeasible. For example, the cost to upgrade Richmond Beach Drive NW will be significantly higher than \$1.6 million.
- The current level of service criteria for intersections in the Richmond Beach area in Shoreline is LOS D. The current cap on daily traffic volumes on Richmond Beach Drive NW is 4,000.

Detailed Comments

- Page 61 - Table 4.11-12 – ITE trip generation rates for Alternative Action

This table differs from Table 4.11-5 (2009 Proposed Action) in that it removes the land use code #820 – Shopping Center to reduce the number of trips generated by the Point Wells development proposal. However, by not including a shopping center or convenience store in the proposal, then my opinion is that the number of internal trips must also be reduced.

The narrative explains that the am peak hour values for LU #814 are likely to be conservatively high. This methodology would be correct, except the values listed in table 4.11-13 are less than half of those derived by the formula. The narrative also states *"the net new daily trips for all the Alternative Action would total 8,251 vehicle trips, which is consistent with the City of Shoreline's daily trip threshold of 8,250 vehicle trips."* If the target is 8,250 daily trips, then the existing trips on Richmond Beach Drive NW (approx 925 in 2009) must be included too. Given the assumptions of 1,800 dwelling units, 115 ksf of office, 20 ksf of retail, and a 10% internal capture rate, the ITE trip generation formulas estimate daily trips of 9,176 from Point Wells.

- Page 62 - The footnotes for Table 4.11-13 indicate that trip deductions are being taken for internal (3 to 6%), peds/bikes (10%), and pass by (34%). Then later in the narrative, it states *"a 10 percent reduction was applied to the total trip estimate. These trips are assumed to travel within the site."* A 3% to 6% internal reduction is appropriate; anything higher would need additional studies and references to support such an assumption. The study needs to clearly state which value was used in the trip computations. Additional studies and references are also needed to support an additional reduction for pedestrian and bike trips. Lastly, pass-by-trip reductions can only be applied to trips already passing by a development. Since Point Wells is at the end of Richmond Beach Drive NW, there are no pass-by trips. A 34% reduction in trips would be inappropriate.
- Page 69 – Table 4.11-17 – Recommended Mitigation for all alternatives

#2) – No Action alternative indicates a signal will be installed. This is incorrect. There is no current need or future plans to install a traffic signal at this location. If a traffic signal is required through increase in traffic due to Point Wells development, then a traffic signal needs to be listed in the mitigations under each applicable alternative instead of assuming it will already be constructed.

#9) – The 50/50 alternative scenario needs the same mitigation as the 2009 proposed action. The alternative action needs mitigation also.

#10) & #11) – These two intersections basically function as one due to their close proximity. The mitigations correctly reflect this association, but the narrative does not.

#16) – The No Action indicates that an additional SB left turn lane will be built. This is incorrect. The intersection has already been rebuilt with a single SB left turn lane. Also, a SB left turn lane is unnecessary. If a left turn lane was added, it would make more sense to add one for NB vehicles as mitigation for Point Wells vehicle trips instead of SB. All proposed mitigations need to be revised to incorporate this instead of claiming an existing project will build it.

#17), # 21), & #23) - No Action alternative indicates a signal will be installed. This is incorrect. There is no current need or future plans to install a traffic signal at this location. If a traffic signal is required through increase in traffic due to Point Wells development, then a traffic

signal needs to be listed in the mitigations under each applicable alternative instead of assuming it will already be constructed.

Roadway Segments – NW 190th St between NW Richmond Beach Rd. and 8th Ave NW – mitigation list traffic calming devices be installed. There are three speed humps already located on this segment. There is little room for even more traffic calming devices.

- Page 75 – table 4.11.21 – Cost estimates for mitigation projects
 - N 185th St and SR 99 mitigation – the No Action project costs are now \$0, as the intersection has already been improved. If the intersection is widened as mitigation for Point Wells traffic, the estimate for \$1,462,500 is much too low. This conclusion is based upon the City's 2011 actual reconstruction costs of the intersection and the actual costs of acquisition of adjacent property.
 - Richmond Beach Drive NW – the estimate of \$1,655,000 to upgrade this roadway is much too low, based upon previous work of the City. The City's estimates account for the topography, existing right-of-way width and City street standards and include improvements such as retaining walls to facilitate the street section.

The City of Shoreline is still concerned with the impacts of the proposed development at Point Wells, and how it impacts the quality of life for our residents. The proposed policy with suggested amendments does align with the City's adopted Subarea Plan for Point Wells. Moreover, we have conferred with and are supportive of the City of Woodway's and Save Richmond Beach's proposed policy amendments.

If you have questions or concerns about our comments, please contact Planning Manager Paul Cohen at (206) 801-2551.

Again, I strongly urge the Council to adopt propose Ordinance Nos. 12-068 and 12-069 with Shoreline's amendment recommendations.

Sincerely,



Rachael Markle
Director Planning & Community Development

cc: Shoreline City Council